

**IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MARYLAND**

BAHRAM SHAKERI

Plaintiff

:

:

:

v.

**8:21-cv-00549-GJH**

:

:

:

PRINCE GEORGE'S COUNTY, MARYLAND

Defendant

:

:

**RESPONSE TO PLAINTIFF'S MOTION FOR LEAVE TO AMEND**

On behalf of the Defendants Plaintiff seeks to add in his Proposed Amended Complaint who are likely employees of Defendant Prince George's County, Maryland, and therefore would be represented by the Prince George's County Office of Law, the undersigned responds to Plaintiff's Motion for Leave to Amend.

As supported in argument contained in the accompanying Memorandum of Law, Plaintiff's Motion for Leave to Amend would be futile and therefore should be denied.

Respectfully submitted,

RHONDA L. WEAVER  
COUNTY ATTORNEY

ANDREW J. MURRAY  
DEPUTY COUNTY ATTORNEY

By: Tonia J. Belton-Gofreed  
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*Counsel for Defendant*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 28<sup>th</sup> day of September, 2021, a copy of the foregoing document was electronically transmitted to this Court and served via CM/ECF and email on:

Faisal Gill, Esq.  
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/s/  
Tonia Belton-Gofreed, Fed. Bar No. 16176